

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ Delta, LLC,
Plaintiff,

v.

CommScope Holding Company, Inc., *et al.*,
Defendants.

Civil Action No.: 2:21-CV-00310-JRG

JURY TRIAL DEMANDED



DECLARATION OF RAJENDRA A. CHIPLUNKAR

I, Rajendra A. Chiplunkar, state as follows in support of Plaintiff TQ Delta, LLC's Motion to Strike Portions of the Non-Infringement Report and Opinions of Defendants' Expert Dr. Leonard J. Cimini, Jr.:

1. I am a partner at McAndrews, Held & Malloy and counsel of record for TQ Delta, LLC. I am a member in good standing of the State Bar of Illinois. I have personal knowledge of the facts set forth in this Declaration.
2. Exhibit A contains an excerpt from a true and correct copy of the Responsive Expert Report of Dr. Leonard J. Cimini, Jr. on the Non-Infringement of the Family 1 and 10 Patents.
3. Exhibit B contains a true and correct copy of the Cover Pleading for Plaintiff's Disclosure of Asserted Claims and Infringement Contentions and Accompanying Document Production.
4. Exhibit C contains an excerpt from a true and correct copy of the Markman Hearing conducted on June 1, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 14th day of December 2022, in River Forest, Illinois.

/s/ Rajendra A. Chiplunkar
Rajendra A. Chiplunkar